

1 LEONARD T. FINK, ESQ.
Nevada Bar No. 6296
2 CHAD D. FUSS, ESQ.
Nevada Bar No. 12744
3 **SPRINGEL & FINK LLP**
4 9075 W. Diablo Drive, Suite 302
Las Vegas, Nevada 89148
5 Telephone: (702) 804-0706
6 E-Mail: *lfink@springelfink.com*
cfuss@springelfink.com
7

8 Attorneys for Defendant/Third-Party Plaintiff
9 *AIR VENT, INC.*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 SAFECO INSURANCE COMPANY OF
13 AMERICA,

14 Plaintiff,

15 vs.
16

17 AIRVENT, INC.,

18 Defendants.
19

20 AIR VENT, INC., a Delaware corporation,

21 Third-Party Plaintiff,

22 vs.
23

24 POWERMAX ELECTRIC CO. LTD.
GUANGDONG; CHIEN LUEN INDUSTRIES
25 CO. LTD.; KING OF FANS, INC., a foreign
corporation and MOES I-X,

26 Third-Party Defendants.
27

28 ///

Case No.: 2:20-cv-01579-JAD-NJK

**STIPULATION AND ORDER TO EXTEND
TIME TO FILE AN OPPOSITION TO
SAFECO INSURANCE COMPANY OF
AMERICA'S MOTION FOR SUMMARY
JUDGMENT (DOCUMENT 69) AND AIR
VENT, INC. TO FILE ITS REPLY IN
SUPPORT OF ITS MOTION FOR
SUMMARY JUDGMENT (DOCUMENT 62)**

ECF No. 72

Pursuant to Local Rule IA 6-1, the Parties, by and through their respective, undersigned, attorneys of record, stipulate and agree that **the deadline for Air Vent, Inc. to file an Opposition to Safeco Insurance Company of America's Motion for Summary Judgment (Document 69) filed on December 7, 2021 shall be extended to January 14, 2022. The deadline for Safeco Insurance Company of America's Reply shall be extended to January 28, 2022.**

The Parties further agree that **the deadline for Air Vent, Inc. to file its Reply in support of its Motion for Summary Judgment (Document 62) filed on November 15, 2021 shall be extended from December 21, 2021 to January 7, 2022.** Safeco Insurance Company of America's Response to Air Vent, Inc.'s Motion for Summary Judgment (Document 68) was filed on December 7, 2021.

This is the first request for an extension. It is made due to the upcoming holidays, pre-planned vacations, and office closures. It is not intended for an improper purpose or to cause delay, but is made in good faith after discussions between the aforementioned counsel of record.

IT IS SO STIPULATED.

DATED this 20th day of December, 2021.

SPRINGEL & FINK LLP

/s/ Chad D. Fuss

LEONARD T. FINK, ESQ.

Nevada Bar No. 6296

CHAD D. FUSS, ESQ.

Nevada Bar No. 12744

9075 W. Diablo Drive, Suite 302

Las Vegas, Nevada, 89148

Attorneys for Defendant/Third-Party

Plaintiff,

Air Vent, Inc.

DATED this 20th day of December, 2021.

OLSON CANNON GORMLEY & STOBERSKI

/s/ Michael E. Stoberski

MICHAEL E. STOBERSKI, ESQ.

Nevada Bar No. 4762

PATERNO C. JURANI, ESQ.

Nevada Bar No. 8136

9950 W. Cheyenne Avenue

Las Vegas, Nevada 89129

Chad J. Stepan, Esq.

[Pro Hac Vice]

MEAGHER & GEER, PLLP

33 South Sixth Street, Suite 4400

Minneapolis, Minnesota 55402

Attorney for Third-Party Defendants,

King of Fans, Inc. and

Chien Luen Industries Co., Ltd

1 DATED this 20th day of December, 2021.

2 LAW OFFICES OF JASON M. PECK

3 /s/ Jason C. Foulger, for

4 _____
5 JASON M. PECK, ESQ.
6 Nevada Bar No. 10183
7 P.O. Box 7218
8 London, Kentucky 40742
9 Attorneys for Plaintiff,
10 *Safeco Insurance Company of America*

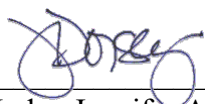
11 **ORDER**

12 Based on the parties' stipulation and good cause appearing, IT IS SO ORDERED.

13 The deadline for Air Vent, Inc. to file an Opposition to Safeco Insurance Company of
14 America's Motion for Summary Judgment (Document 69) is extended to January 14, 2022.

15 The deadline for Safeco Insurance Company of America's Reply in support of that motion is
16 now January 28, 2022.

17 The deadline for Air Vent, Inc. to file its Reply in support of its Motion for Summary
18 Judgment (Document 62) is extended to January 7, 2022.

19 
20 _____
21 U.S. District Judge Jennifer A. Dorsey
22 Dated: December 29, 2021
23
24
25
26
27
28